

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 18-CR-0855
)	
JORGE ZAMORA-QUEZADA,)	
)	
Defendant.)	

AGREED MOTION FOR PROTECTIVE ORDER

The United States of America, by and through undersigned counsel, hereby submits this Agreed Motion for Protective Order, and respectfully states as follows:

The Federal Bureau of Investigation (“FBI”) is legally mandated to identify victims of federal crimes that it investigates. The FBI received numerous calls from individuals who believed that they or their loved ones may have been affected by the alleged crimes of Defendant Jorge Zamora-Quezada. The FBI maintained a spreadsheet (“Victim Spreadsheet”) documenting such contact which was the subject of an August 29, 2019 Protective Order of this Court. (*See* Dkt. 412).

FBI Victim Specialist Veronica Bernal, whom the Government intends to call as a witness at the October 26, 2020 loss hearing in this case, took handwritten notes in connection with some conversations with victims (“Victim Notes”) before transferring that information to the Victim Spreadsheet. Like the Victim Spreadsheet, the Victim Notes contain confidential and highly sensitive information. The United States has proposed terms of a protective order and acknowledgement governing the Government’s production of the Victim Notes mirroring the terms of the protective order governing the Victim Spreadsheet.

The undersigned and counsel for Defendant Jorge Zamora-Quezada conferred, and counsel for Defendant Jorge Zamora-Quezada stated that he does not oppose the terms of the protective

order and acknowledgement.

The proposed order and acknowledgement are submitted herewith in the form of a proposed order.

The United States respectfully requests that the Court enter the proposed order governing the Government's production of the Victim Notes.

Respectfully submitted,

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Deputy Chief, Health Care Fraud Unit

s/ Rebecca Yuan
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CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that I conferred with counsel for Defendant Jorge Zamora-Quezada, who stated that he does not oppose the terms of the protective order and acknowledgement.

s/ Rebecca Yuan
Rebecca Yuan
Trial Attorney
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 23, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and/or provided an electronic copy to Defendant's counsel of record.

s/ Rebecca Yuan
Rebecca Yuan
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